

REMARKS

This Amendment, submitted in response to the Office Action dated October 3, 2003, is believed to be fully responsive to each point of rejection raised therein. Accordingly, favorable reconsideration on the merits is respectfully requested.

As a preliminary matter, the Examiner objects to claim 11 for duplicating claim 3. Claim 11 is now rewritten to depend on claim 8, thereby obviating the rejection.

Claims 1-19 remain pending in the application, with claims 3-12, 15-16 and 18-19 being deemed allowable over the art of record. Claims 3-6, 11-12 and 18-19, though deemed to describe allowable subject matter, have been objected to for depending on rejected base claims. Applicant would submit that claim 19 should be allowed based on its dependency on allowed claim 7. Claims 1-2, 13-14 and 17 have been rejected under 35 U.S.C. § 102(e) as being anticipated by Eshed (U.S.P. 6,115,056). Applicant submits the following arguments in traversal of the prior art rejections.

Applicant's invention relates to an apparatus and method that provides a highly accurate exposure. In an exemplary embodiment, an exposure head including a light source is moved towards and away from a target medium to maintain a particular distance between the medium and the light source. As claimed, the invention includes movement of the light source to compensate for distance.

Turning to the cited art, Eshed relates to focusing by adjusting positions of lenses relative to a light source. In particular, in the description of the background, focusing compensation includes a movable lens which moves relative to a stationary lens to focus the light source. Col. 1, lines 60-67. In the exemplary embodiment of Eshed, the lenses 114 are moved in a housing.

The lenses receive light projected through optical cables in a pig-tail fashion, with the light source being placed outside of the housing.

The Examiner contends that Eshed teaches each feature of claim 1. The rejection is not supported. Even though Eshed and the present invention relate to focusing of a light source to a target, the structure of Eshed relates to movements of lens elements. The distance of a drum to a light source is not particularly accounted for, and movement of a light source is not disclosed. Therefore, claim 1 is patentable over the cited art. Claims 13 and 17 have similar recitations and are patentable for analogous reasons.

With further regard to claims 13 and 17, these claims describe a memory for corrective data. The Examiner relies generally on a focusing apparatus 12 to teach the memory devices. However, the focus can be achieved in the absence of stored data, such as by real-time measurement and correction. Therefore, the focusing apparatus 12 of Eshed does not inherently include a memory as described by claims 13 and 17. Claim 14 is further patentable based on its dependency.

In view of the above, Applicant submits that claims 1-19 are in condition for allowance. Therefore it is respectfully requested that the subject application be passed to issue at the earliest possible time. The Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary.

AMENDMENT UNDER 37 C.F.R. § 1.111
U.S. Appln. No. 09/917,880

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

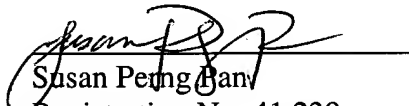
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